

BP#### Sanctuary Schools: Creating Safe Campus Environments for Students and Families

Background

Law enforcement activities in and around schools, including immigration enforcement, create hardships and barriers to health and educational attainment for all students, including immigrant students; severely disrupt the learning environment and educational setting; and create a climate of fear, conflict, and stress that affects all students, regardless of their background, citizenship or immigration status.¹ For these reasons, school officials should not use school resources or personnel to facilitate law enforcement activities, including immigration enforcement, on campus except as otherwise required by law.

The District is committed to providing an inclusive, welcoming and safe learning environment for all students, including immigrant students and their families. The District recognizes that the school-to-prison/deportation pipeline is perpetuated by certain school practices (e.g., law enforcement presence, school arrests, zero-tolerance policies, criminalizing school violations). As such, the District seeks to reduce student contact with law enforcement, including immigration enforcement, and protect students from discrimination and exclusionary practices. The District shall not involve law enforcement in student disciplinary issues and instead use the framework of restorative justice.

Designated school site administrators and staff may request law enforcement assistance only when there is an emergency involving imminent danger of serious physical injury or death to a person on school property.² A parent/guardian who requests that District or school staff call for law enforcement assistance where there is no imminent danger of serious physical injury or death to a person on school property shall be informed that District policy requires alternative measures shall be taken to respond to the situation. School and District administrators shall provide the parent/guardian with a list of alternative measures that may be taken to respond to the situation along with any community resources that may be used, as appropriate.

¹ “Citizenship or immigration status” refers to all matters regarding citizenship, the authority to reside in or otherwise be present in the United States, the time or manner of a person’s entry into the United States, or any other immigration matter within the purview of the Department of Homeland Security (“DHS”) or other federal agency charged with the enforcement of immigration law.

² A threat of death or serious bodily injury is ‘imminent’ when, based on the totality of the circumstances, a reasonable officer in the same situation would believe that a person has the present ability, opportunity, and apparent intent to immediately cause death or serious bodily injury to the peace officer or another person. An imminent harm is not merely a fear of future harm, no matter how great the fear and no matter how great the likelihood of the harm, but is one that, from appearances, must be instantly confronted and addressed.” Cal. Penal Code § 835a(e)(2). “Serious physical injury” is defined as “bodily injury which involves (a) a substantial risk of death; (b) extreme physical pain; (c) protracted and obvious disfigurement; or (d) protracted loss or impairment of the function of a bodily member, organ, or mental faculty.” 18 USC § 1365(h)(3).

The District is also committed to protecting the confidentiality of sensitive information about students and their families through policies that prohibit information-sharing with law enforcement, including federal immigration authorities,³ to the fullest extent possible under the law. To ensure student and family privacy is protected, the District shall routinely update and review data-sharing policies, including with vendors who collaborate with law enforcement. The District and schools shall not include information about a student or their family's actual or perceived immigration status in the directory and shall provide parents/guardians annual notice of the information on the registry, information about how information on the registry may be accessed if required by law, and an opportunity to revise their information if desired.

The District shall not adopt or implement policies, practices, or procedures that exclude students from school based on their or their parents' or guardians' actual or perceived immigration status or other actual or perceived characteristics, including nationality, race or ethnicity, religion, disability status, gender, gender identity, gender expression, sexual orientation, or association with a person or group with one or more of these actual or perceived characteristics. Further, District personnel shall treat all students equitably in their receipt of school services, including, but not limited to, the free and reduced meal program, transportation, access to school services, and educational instruction.

The specific provisions of this policy limit the District's participation in non-school-related law enforcement activities,⁴ including enforcing immigration law, to the maximum extent permitted by law. The District believes these policies are necessary to fulfill the District's obligation to provide all students equal access to education, regardless of their actual or perceived immigration status.

Legal Framework Protecting Immigrant Students

All children in California have the right to equal educational opportunities in public educational institutions. The United States Supreme Court held in *Plyer v. Doe* (1982) that public school districts cannot deny children access to education based on their immigration status, citing the harm such denial inflicts on children and society itself, and finding such a policy violates the equal protection clause of the Fourteenth Amendment. Similarly, the California Supreme Court in *Maria P. v. Riles* (1987) held that protecting immigrant students' right to equal educational opportunity under the California Constitution is "vitaly important right in our society." The California Constitution, Article 1, Section 28(f)(1) provides,

³ "Federal immigration authorities" means any officer, employee, or person otherwise paid by or acting as an agent of United States Immigration and Customs Enforcement ("ICE") or any division thereof, an officer, employee, or person otherwise paid by or acting as an agent of Customs and Border Protection ("CBP") or any other officer, employee, or person otherwise paid by or acting as an agent of the United States Department of Homeland Security ("DHS") who is charged with the enforcement of immigration law.

⁴ "Non-school-related law enforcement activities" are matters that are not related to a Federal or State supported education program or that regard a law violation that was committed off school property. District property includes, but is not limited to, all school sites, early education centers, adult school facilities, and District administrative offices.

“[a]ll students and staff of public primary, elementary, junior high, and senior high schools, and community colleges, colleges, and universities have the inalienable right to attend campuses which are safe, secure and peaceful.” The California Education Code, Section 200 provides, “[i]t is the policy of the State of California to afford all persons in public schools, regardless of their disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic that is contained in the definition of hate crimes set forth in Section 422.55 of the Penal Code, including immigration status, equal rights and opportunities in the educational institutions of the state.” The California Education Code, Section 201 provides, “(a) All pupils have the right to participate fully in the educational process, free from discrimination and harassment; (b) California’s public schools have an affirmative obligation to combat racism, sexism, and other forms of bias, and a responsibility to provide equal educational opportunity.”

Definitions:

“Citizenship or immigration status” means all matters regarding questions of citizenship of the United States or any other country, the authority to reside in or otherwise be present in the United States, the time or manner of a person’s entry into the United States, or any other civil immigration matter enforced by the Department of Homeland Security or other federal agency charged with the enforcement of civil immigration law.

“Immigration enforcement agent” means any officer, employee, or person otherwise paid by or acting as agent of U.S. Immigration and Customs Enforcement (“ICE”) or any division thereof, an officer, employee, or person otherwise paid by or acting as an agent of U.S. Customs and Border Protection (“CBP”), any individuals authorized to conduct enforcement of civil immigration laws under 8 U.S.C. §1357(g), or any other officer, employee, or person otherwise paid by or acting as an agent of the United States Department of Homeland Security (“DHS”) who is charged with the enforcement of civil immigration laws, and any successors.

“Non-school-related law enforcement activities” are matters that are not related to a Federal or State supported education program or that regard a law violation that was committed off school property. Enforcement activities include, but are not limited to, arrests; interviews; searches; surveillance; obtaining records, documents, and similar materials; and other actions for the purposes of law enforcement, including federal immigration enforcement. District property includes, but is not limited to, all school sites, early education centers, adult school facilities, and District administrative offices.

Prohibition Against Non-School-Related Law Enforcement Activities by District or on Campus

In addition to establishing a climate of fear, conflict, and stress, when school police and other district staff are involved in law enforcement regarding non-school-related matters,⁵ including enforcing immigration law, it 1) creates the perception that their priority is law enforcement rather than education; 2) creates the perception that they are exercising federal immigration

⁵ “District staff and personnel” includes all persons employed by the District, including District administrative staff, school personnel, and school security personnel and police officers.

enforcement authority; and 3) undermines the District's constitutional obligation to provide equal educational opportunity to all students.⁶

The District shall not enter into agreements with state or local law enforcement agencies, or any federal agency, to use District resources, including personnel, to conduct or support immigration enforcement activities.

If the District employs law enforcement officers, such officers have no authority to enforce immigration law and shall not participate in immigration enforcement efforts. Where the District has an arrangement with an outside law enforcement agency to station law enforcement officers on District campuses, the District shall have a memorandum of understanding with that external law enforcement agency stating that its officers shall not participate in immigration enforcement efforts on campus. This means that, when stationed at District schools, law enforcement officers shall not: hold individuals in custody on detainers issued by federal immigration authorities,⁷ respond to notification or transfer requests from federal immigration authorities,⁸ make arrests based on civil immigration warrants,⁹ or otherwise facilitate the use of campus facilities for immigration enforcement purposes.

Law Enforcement Access to School Site or Request to Interview a Student

In accordance with these principles and consistent with general District policies restricting visitor access to school sites for school-related purposes only, the District shall deny all requests by law enforcement officers, including immigration authorities, for open access to a school site or to interview a student regarding non-school-related matters. These requests shall be immediately forwarded to the District Superintendent and District General Counsel. The District Superintendent and District General Counsel shall review the request and make a final decision on whether facilitating such access is legally required and/or whether such actions would conflict

⁶ *Plyler v. Doe*, 457 U.S. 202, 219-230 (1982); *League of United Latin Amer. Citizens v. Wilson*, 908 F. Supp. 755, 774 (C.D. Cal. 1995); U.S. DEP'T OF EDUC., DEAR COLLEAGUE LETTER ON EQUAL ACCESS FOR ALL CHILDREN TO PUBLIC SCHOOLS, REGARDLESS OF IMMIGRATION STATUS 1-2 (May 8, 2014), available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201405.pdf>.

⁷ "Detainer" or "hold request" means a request from federal immigration authorities that a local law enforcement agency maintain custody of an individual currently in its custody beyond the time he or she would otherwise be eligible for release to facilitate transfer to federal immigration authorities and includes, but is not limited to, DHS Form I-247D.

⁸ "Notification request" means a request from any federal immigration authority that a local law enforcement agency inform federal immigration authorities of the release date and time in advance of the public of an individual in its custody and includes, but is not limited to, DHS Form I-247N. "Transfer request" means a request by any federal immigration authority that a local law enforcement agency facilitate the transfer of an individual in its custody to federal immigration authorities, and includes, but is not limited to, DHS Form I-247X.

⁹ "Civil immigration warrant," also known as an administrative removal warrant, means any warrant for arrest for a violation of federal civil immigration law or to execute a removal order, and includes civil immigration warrants entered in the National Crime Information Center database.

with District compliance with the legal principles articulated in *Plyler v. Doe* and other applicable laws.

When law enforcement officers, including federal immigration enforcement agents, request access to a school site or to interview a student for a non-school-related purpose, the District Superintendent and/or District General Counsel shall ask for valid identification, including the officers' credentials, ask why the officers are requesting access, and ask to see a valid warrant signed by a federal or state judge. The officers must provide to the Superintendent and/or General Counsel written authorization from their employing agency instructing them to enter District property and the purpose of such entry, as well as a warrant signed by a federal or state judge that specifies the name of the person under arrest or area to be searched, unless the student's behavior presents an imminent danger of serious physical injury or death to a person on school property. If the officers cannot provide such written authority and warrant, the Superintendent and/or General Counsel shall deny their request for access to District property unless otherwise required by law, as determined by the General Counsel.

If the law enforcement officers satisfy the above criteria, or the student's behavior presents an imminent danger of serious physical injury or death to a person on school property, the school site principal or his/her designee shall monitor the officers' investigation and ensure the officers are not provided access to information, records, and areas beyond that specified in the warrant. For student interviews, a private location out of sight and hearing of other students should be arranged, where practicable, that will help avoid invading the student's privacy, jeopardizing the safety and welfare of other students, and further disrupting the school campus. The principal or designee shall discourage law enforcement officers from interviewing or escorting students through school hallways in view of students. The District expects that law enforcement officers will provide the principal or designee the opportunity to be present during any interview of a student. Additionally, the District shall immediately inform the student of their right to request that a parent/guardian or attorney to be present when interacting with law enforcement.

Law Enforcement Access to Student Records

The District shall not disclose or provide, in writing, verbally, or in any other matter, student education records or any information about a student or a student's family and household to non-school officials for any purpose that is not education-related without written consent from the student's parent or guardian or a valid court order for the records. This prohibition includes requests from law enforcement to access student directory information and information that may be disclosed to law enforcement under the Family Education Rights and Privacy Act ("FERPA").¹⁰ If presented with any subpoena for student records, including an ICE

¹⁰ FERPA authorizes, but does not require, the District's voluntarily disclosure of student directory information. The District will refuse any informal request for voluntary disclosure of student directory information.

Administrative Subpoena,¹¹ the District's General Counsel shall make a determination whether the request is education-related and, if not, refuse access to the records based on the District's general policy against sharing student records for any purpose that is not education-related and the District's need to ensure its resources are effectively allocated. In the event the law enforcement agency seeks to enforce the subpoena for the records in court, the District will oppose that motion and may appeal a court order enforcing the subpoena. The District will comply with any final court order enforcing a subpoena for access to records. The District's General Counsel will review all court orders and subpoenas provided by law enforcement, including federal immigration enforcement.

When required by judicial warrant or other federal or state court order to provide access to a student's records for a non-school-related purpose,¹² including immigration enforcement, the school site principal or his/her designee shall monitor the law enforcement investigation. Such monitoring shall include guaranteeing that the law enforcement officers access only the information specified in the warrant or judicial order.

Law Enforcement Request to Take Custody of a Student

When law enforcement officers, including federal immigration enforcement agents, request to interview a student for a non-school-related purpose, the District Superintendent and/or District General Counsel shall ask for the officers' credentials, ask why the officers are requesting the interview, and ask to see a warrant signed by a federal or state judge. The officers must provide to the Superintendent and/or General Counsel written authorization from their employing agency instructing them to interview or arrest the student, as well as a warrant signed by a federal or state judge that accurately specifies the name of the person under arrest. If the officers are not able to provide such written authority and warrant, the Superintendent and/or General Counsel shall deny their request to interview the student unless otherwise required by law as determined by the General Counsel. If a student is removed from campus by law enforcement, the District is required to contact the student's parent or guardian. The District shall not use its resources to facilitate access to students, including any law enforcement interview, that does not have an education-related purpose and is therefore disruptive of the educational environment.

Law Enforcement Detention of a Parent or Guardian

In the event a student's parent or guardian has been arrested by federal immigration authorities, the District shall use the student's emergency card contact information and release the student to the person(s) designated as emergency contacts by the student's parent or guardian.

¹¹ "ICE Administrative Subpoena" is a subpoena to require the testimony of witnesses or production of records.

¹² "Judicial warrant" means a warrant based on probable cause and issued by a state or federal judge or a federal magistrate judge that authorizes federal immigration authorities to take into custody the person who is the subject of the warrant.

Alternatively, the District shall release the student into the custody of an individual who presents a Caregiver's Authorization Affidavit on behalf of the child.¹³ The District is required under state law to exhaust any parental instruction relating to the student's care in the student's emergency contact information. The District is encouraged to work with parents or guardians to update the emergency contact information and not to contact Child Protective Services to arrange for the student's care unless the school is unable to arrange for care through the use of emergency contact or other information or instructions provided by the parent or guardian.

Student Informational Privacy

Prohibition Against District Inquiries Relating to Students' and Families' Personal Information

Keeping sensitive student information confidential is essential to creating a safe and inclusive educational environment. Accordingly, District staff shall only collect information about students that is necessary for educational purposes. Certain categories of information about a student or their family members are deemed "sensitive and confidential," and may not be shared with any non-school officials, including any law enforcement agency, for any non-educational purpose absent written parent or guardian consent or a valid court order.¹⁴ Sensitive and confidential information includes the following non-exhaustive list:

1. Actual or perceived national origin and race/ethnicity;
2. Actual or perceived immigration or citizenship status, including a student's social security number or information contained in a student's passport, birth certificate, residency-or citizenship-related documents;
3. Actual or perceived religion;
4. Actual or perceived gender identity;
5. Actual or perceived gender expression;
6. Actual or perceived sexual orientation;
7. Actual or perceived status as a crime victim or witness;
8. Records of juvenile criminal allegations, arrests, convictions, or adjudications;
9. School discipline record;

¹³ Use of the Caregiver's Authorization Affidavit is authorized by Part 1.5 (commencing with Section 6550) of Division 11 of the California Family Code.

¹⁴ FERPA authorizes, but does not require, the District's voluntarily disclosure of student directory information. The District will therefore refuse any informal request for voluntary disclosure of student directory information.

10. Health or medical information;
11. Recipient of public assistance; and
12. All information included in an individual's or household's income tax records.

District staff shall not inquire about or record a student's or their family member's citizenship or immigration status, or require the student or parent to produce documentation of a student's or their family member's citizenship or immigration status (such as asking for a green card, birth certificate, social security, or citizenship papers), at any time. District staff shall not require a student to present a proof of citizenship or immigration status to apply, enroll in, or register for services for which the student is eligible.

Prohibition Against Blanket Electronic Searches of Student Devices, Accounts, or Information

Student electronic devices and accounts can contain a vast amount of sensitive and confidential information, including a student's immigration status, religion, sexual orientation, gender identity, gender expression, or other protected characteristics under California Education Code sections 200 and 220. The California Electronic Communications Privacy Act (CalECPA), Penal Code sections 1546 et seq., protects students' privacy rights in electronic devices by prohibiting searches except under specified exceptions, including pursuant to a valid search warrant, with consent or in a specified emergency, as well as by imposing procedural safeguards on any searches that are conducted. To protect students' sensitive and confidential information, District personnel, including school police, shall not search a student's electronic devices, accounts, or information without the student's consent unless the school complies with CalECPA and any other relevant laws limiting its authority to conduct the search or to use or disclose any information obtained via the search.

Prohibition Against Information Sharing with Local Law Enforcement and Federal Immigration Authorities

District staff shall not initiate communication with any law enforcement agency, including any federal immigration enforcement agency, regarding a student's or their family member's sensitive and confidential information referred to above.

District policy regarding access to District schools and student records is set forth above in the section entitled "Law Enforcement Access to School Site or Request to Interview a Student."

Prohibition Against Information Sharing Between District Law Enforcement Personnel and Local Law Enforcement Agencies for a Non-School-Related Purpose

To fulfill its Constitutional obligation to provide equal educational opportunity to all students regardless of their immigration status, and consistent with this Policy, the District shall refuse all voluntary information-sharing with law enforcement authorities for a non-school-related purpose across all aspects of the District to the fullest extent possible under the law. District security

officers shall not enter into agreements to share student information with local law enforcement or federal immigration authorities except as required by law.

Prohibition Against Agreements for On-Campus Security Services with Local Law Enforcement Agencies with Inadequate Information-Sharing Policies

The District shall not employ officers from, or enter into agreements for security services with, law enforcement agencies that have agreements, policies, or procedures that promote or facilitate information-sharing for non-school-related purposes such as immigration enforcement.

The District recognizes that policies and procedures authorizing information-sharing between law enforcement agencies, including federal immigration agencies, are not necessarily formal agreements. Information-sharing can occur through unofficial agreements, policies, and practices, or unintentionally on shared databases. Accordingly, to prevent disclosure of student information, the District will review the information-sharing agreements, policies, and procedures of every law enforcement agency with which the District intends to enter into a formal agreement for security or other services. If the District is currently under an agreement with a local law enforcement agency for security services, the District will review the local law enforcement agency's information-sharing policies, procedures, and agreements for provisions that promote or facilitate information-sharing for non-school-related purposes, including with federal immigration authorities, to ensure compliance with this policy to the greatest extent possible.

Procedures for Identifying and Reviewing Information Sharing Agreements

To determine whether a law enforcement agency has a problematic information-sharing agreement or practice, the District shall consider the following:

- Whether the law enforcement agency shares information on shared databases;¹⁵
- Whether the law enforcement agency communicates with other agencies for a non-school-related purpose, including federal immigration authorities, in any capacity, including, but not limited to:
 - In response to contact initiated by federal immigration authorities; or
 - Upon learning of an individual's immigration status.

If the District employs officers from, or has security agreements with, a law enforcement agency that shares information with any federal immigration enforcement agency, the District shall determine whether the operative agreements with the local law enforcement agency adequately

¹⁵ Known shared databases and mechanisms include, but are not limited to: CalGangs, Priority Enforcement Program ("PEP"), and Criminal Alien Program ("CAP") or those of private federal government contractors.

protect students' personal information. The District must immediately amend or render inoperative agreements, terms, and clauses that:

- Establish no barriers to law enforcement officer access to students' educational records as defined under the Family Educational Rights and Privacy Act;
- Do not limit the scope of a law enforcement officer's access to student educational records to information directly relating to the officer's reason for accessing the record;
- Give law enforcement officers indefinite access to students' educational records; or
- Fail to ensure compliance with this Policy.

Parental Privacy in Biometrics

To the extent that the school district requires Live Scan background checks with the U.S. Department of Justice as a requirement to volunteer in a school, the school district shall also notify all families to consider consulting an immigration attorney to learn of potential immigration-related consequences associated with providing their fingerprints to the U.S. Department of Justice.

Parental Notification

If any law enforcement agency, including any federal immigration enforcement agency, requests or gains access to a District student or their records for a non-school-related purpose, District staff shall immediately notify the student's parent or guardian that the law enforcement agency sought access to the student or the student's records. The District shall remind the parent that they have the right to authorize and send a designee to pick up their child on the parent's behalf. The District shall allow the child to wait in the office until the parent or his or her designee pick up the student. District personnel who provide parental notice are prohibited from inquiring into the parent or guardian's immigration status.

Efforts to contact the student's parent/guardian or adult serving as a surrogate parent/caregiver by the principal or designee must include: (1) calling all numbers listed on the student's emergency card, including (a) work numbers, (b) cell phone numbers, (c) all numbers supplied by the student; and (d) phone numbers for any identified adults serving as a surrogate parent/caregiver; and (2) sending an email to all email addresses listed for the parent/caregiver and any adults identified as a surrogate parent/caregiver. The principal or designee shall record the time(s) of contact or attempted contact with the parent/guardian or adult serving as a surrogate parent/caregiver, and the District shall maintain a record of that contact for at least three years. If the principal or designee cannot reach the parent/guardian or adult serving as a surrogate parent/caregiver, they shall leave messages where applicable and follow up with written documentation.

When notifying the student's parent or guardian, District staff shall also direct the notified parent to District-approved resources regarding parents' rights when law enforcement authorities, including federal immigration authorities, question or detain their children at school. The

District shall provide families with “know your rights” information on immigration enforcement established by the California Attorney General. The District-approved resources should be developed by organizations that specialize in immigrants’ rights issues.

The District shall annually notify parents and caretakers of their children’s right to a free public education, regardless of race, national origin, immigration status, or religion, including information on educational rights issued by the California Attorney General. Alternatively, such information may be provided through any other cost-effective means determined by the Superintendent or designee.

The school district shall also annually notify parents and caretakers of the school’s policies for student privacy policies that include:

- Assurances that the school district will not release information to third parties for immigration-enforcement purposes, except as required by law or court order as explained above;
- A description of the types of student records maintained by the school district;
- A list of the circumstances or conditions under which the school district might release student information to outside people or entities;
- A statement that, unless the school district is providing information for a legitimate educational purpose under FERPA and the California Education Code or directory information, the school district shall notify parents or guardians and eligible students—and receive their written consent—before it releases a student’s personally identifiable information;
- A statement that describes parents’ rights to inspect student information.

This notification must also inform parents and caretakers that they can opt out of the release of directory information and must clearly note the deadline the parent(s)/guardian(s) and adult students must submit their request to opt out.

Data Tracking

The school principal or designee shall document each instance when any law enforcement authority, including federal immigration agents, requests access to a school site, student records, or student for a non-school-related purpose; each instance when such law enforcement authority interviews a student on school grounds; and each instance when such law enforcement authority detains a student on school grounds. Such records shall include the date and time, name and identifying number of all law enforcement officers involved in the request; the agency employing the law enforcement officers and each officer’s official capacity; the time when each law enforcement officer arrived and left; whether the principal or designee was or was not present during the student interview; the reason the student was questioned and/or released; and any other pertinent information.

The school principal or designee shall also notify the Superintendent and enter a written Incident Report the same day to detail any law enforcement activity with a non-school-related purpose, including immigration enforcement activity, involving a District student. All Incident Reports shall be logged into the District’s centralized database system. All Incident Reports, and the centralized database system, must record the school site, nature of the incident or offense, race, ethnicity, gender, disability, if applicable, and age of the student or students involved in the incident. The database system shall be structured in a way that will protect the individual student’s identity if records from the system are released to the public.

The Incident Report procedures and protocol shall comport with requirements and guidelines set forth in the paragraphs above. Specifically, in drafting the written Incident Report, the school principal or designee shall not record the student’s personal identifying information.

Training and Distribution of Policy

Within the next 90 days, the Superintendent shall develop a plan for training teachers, administrators and other staff on how to respond to law enforcement authorities with a non-school-related purpose who request information about students and families and/or attempt to enter school property. The training plan shall also include procedures for notifying families about such law enforcement officers’ efforts to gain information about students and families, and how to support students whose family members have been displaced because of immigration enforcement. The Superintendent shall create multiple language versions of the plan and distribute it to all District families.

Policy

[District]

Adopted:

[Location]

Revised: